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COMPANY and WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHAHRIAR JABBARI, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

WELLS FARGO & COMPANY and WELLS
FARGO BANK, N.A.,

Defendants.

Case No. 15-CV-02159 VC

**REVISED STIPULATION EXTENDING
TIME TO RESPOND TO THE
COMPLAINT AND ORDER**

Judge: Hon. Vince Chhabria
Ctrm.: 4
Action Filed: May 13, 2015

This Stipulation is made by and between Plaintiff Shahriar Jabbari and Defendants Wells
Fargo Bank, N.A. and Wells Fargo & Company, as follows:

WHEREAS, Defendants were served with the summons and complaint in this action on or
about May 19, 2015;

WHEREAS, Defendants have not yet answered or otherwise responded to the complaint;

1 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1), Defendants had
2 twenty-one days from the date of service of the complaint to answer or otherwise respond to the
3 complaint (*i.e.*, by June 9, 2015);

4 WHEREAS, Plaintiff has agreed to extend the deadline for Defendants to answer or
5 otherwise respond from June 9, 2015 to July 9, 2015;

6 WHEREAS, the Court disapproved a prior stipulation of the parties regarding scheduling
7 and directed that they agree upon a schedule that would result in a hearing not later than
8 September 10, 2015;

9 WHEREAS, counsel for the parties have conferred regarding Defendants' potential
10 responses to the Complaint and there remains uncertainty regarding what will be entailed in
11 briefing a motion or motions that might be filed, and therefore both counsel for Plaintiff and
12 counsel for Defendants wish to reserve the right to request additional briefing time upon review
13 of the submissions by the opposing party;

14 WHEREAS, counsel for Plaintiff and counsel for Defendants have accordingly agreed
15 that, subject to any modification approved by the Court after the filing of the moving papers or
16 opposition papers, the opposition to any motion filed by Defendants in response to the complaint
17 will be filed not later than August 11, 2015, any reply in support of such a motion will be filed
18 not later than August 27, 2015, and any such motion will be set for hearing on September 10,
19 2015.

20 WHEREAS, counsel for Plaintiff and counsel for Defendants have agreed that nothing in
21 this stipulation prevents any party from pursuing litigation options provided by the Federal Rules
22 of Civil Procedure, including but not limited to Plaintiff amending his complaint pursuant to Rule
23 15(a).

24 NOW, THEREFORE, Plaintiff and Defendants, through their respective counsel of record,
25 hereby stipulate that:

26 (i) Defendants shall have through and including July 9, 2015 to answer or otherwise
27 respond to the Complaint;

28

(ii) Plaintiff shall have through and including August 11, 2015 to file his brief in opposition to any motion Defendants may file in response to the Complaint;

(iii) Defendants shall have through and including August 27, 2015 to file any reply brief in support of any motion filed in response to the Complaint;

(iv) any motion filed in response to the Complaint will be noticed for hearing on September 10, 2015; and

(v) notwithstanding the foregoing, Plaintiff and Defendants reserve the right to seek additional time from the Court (by stipulation, or if the parties do not agree, by Administrative Motion) after reviewing the submissions filed by the opposing side.

DATED: June 22, 2015

MUNGER, TOLLES & OLSON LLP

By: /s/ David H. Fry
David H. Fry

Attorneys for Defendants,
Wells Fargo Bank, N.A. and Wells Fargo &
Company

DATED: June 22, 2015

KELLER ROHRBACK, L.L.P.

By: /s/ Matthew J. Preusch
Matthew J. Preusch

Attorneys for Plaintiff,
Shahriar Jabbari

Date: June 24, 2015

